

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 1:22-cv-21130-BB**

JOSE TELLERIA,

Plaintiff,

v.

AZTLAN FOODS, CORP.,
OKAN EBI CITRUS AND PRODUCE CORP.,
and MARIO L. ESPINOSA,

Defendants.

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**DEFENDANTS' INITIAL DISCLOSURES PURSUANT
TO RULE 26**

Defendants, AZTLAN FOODS, CORP. and EVI, INC., (“Defendants”), by and through their undersigned counsel and pursuant to Fed. R. Civ. P. 26(a)(1), hereby provides counsel for Plaintiff, JOSE TELLERIA (hereinafter “Plaintiff”), with the following initial disclosures. Defendants reserve the right to supplement these Rule 26 disclosures as litigation in this matter proceeds.

GENERAL STATEMENT

Defendants do not intend to disclose information that is privileged or is otherwise immune from discovery. Disclosures of any information protected by the attorney-client privilege, work product doctrine, or any other applicable privilege shall be deemed inadvertent. Inadvertent disclosure of any such information shall not constitute a waiver or prejudice of any privilege or any other ground for objecting to discovery with respect to any such information, nor shall such inadvertent disclosure waive or prejudice the right of Defendants to object to the use of any such information during this or any subsequent proceeding.

The disclosures herein are based on the best information available to Defendants as of this date. Defendants reserve the right to modify, amend, and/or supplement these disclosures. Defendants' disclosures shall not constitute an admission by it that the information is properly discoverable or admissible at trial, and shall not constitute a waiver of any objection which might otherwise be made to the disclosure of such information.

Finally, all relevant non-privileged documents—to the extent such documents exist in Defendants' possession, custody, and/or control—will be made available for inspection and copying at a mutually convenient date and time, or shall be produced via hardcopy or electronic format (see Section B for method of production).

Subject to the foregoing, Defendants makes the following disclosures, pursuant to Rule 26(a)(1):

A. Individuals likely to have discoverable information.

Name	Address	Phone Number	Knowledge
Luis Echeverria	c/o Law Offices of Charles Eiss, P.L.	(954) 914-7890	Mr. Echeverria is presumed to have knowledge of Plaintiff's claims and Defendant's defenses.
Mariana Saul	c/o Law Offices of Charles Eiss, P.L.	(954) 914-7890	Ms.Saul is presumed to have knowledge of Plaintiff's claims and Defendant's defenses.
Jose Telleria	c/o FairLaw Firm	(305) 230.4884	Mr. Telleria is presumed to have knowledge of his claims.

Defendants reserves the right to supplement their disclosures as this case and discovery progresses. Plaintiff also incorporates those individuals listed in Defendants' Rule 26 Disclosures herein as though the same were fully written.

B. Categories of Documents.

1. Documents related to Plaintiff's work hours.
2. Documents related to Plaintiff's pay records.

See AZTLAN FOODS 000001-000071.

All documents listed above are in the possession of Defendant's counsel.

C. Calculation of Damages

Not applicable.

D. Insurance.

Not applicable.

Dated: June 8, 2022.

LAW OFFICES OF CHARLES EISS, P.L.

Attorney for Plaintiff

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By: /s/ Charles Eiss

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by email delivery this the 8th day of June, 2022, to: The Service List below.

/s/ Charles Eiss

CHARLES EISS, ESQ.

SERVICE LIST

**United States District Court
Southern District of Florida**
Telleria v. Aztlan Foods, Corp., et al
CASE NO. 1:22-cv-21130-BB

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Method of Service: Email